

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:

MICHAEL ANDREW NEUBIG,

Debtor.

CAPTURE EDUCATIONAL CONSULTING
SERVICES, INC.,

Plaintiff,

v.

MICHAEL ANDREW NEUBIG,

Defendant.

Case No. 17-54061

Chapter 7

Judge C. Kathryn Preston

Adv. Proc. No. 17-2150

RICHARD JONES
CLERK OF COURT
U.S. BANKRUPTCY COURT
COLUMBUS, OHIO

2018 JUN -8 PM 3:18

FILED

MOTION FOR CONTINUANCE OF JUNE 19th HEARING

Defendant, Michael Neubig, moves this court for an order continuing the hearing currently scheduled June 19th, 2018 to a later date, 30-60 days that is convenient to the court.

In support of his motion, Defendant Neubig states:

Michael Neubig is defending himself pro se in this matter at this time. Since the time of the scheduling of this hearing, Michael Neubig and Victoria Powers, attorney for plaintiff Capture Educational Consulting Services have been discussing possible settlement agreements, but have not been able to achieve terms satisfactory to both parties. In addition, Capture Educational Consulting Services has taken significant time between communications, four weeks at one point. At this time, the parties have not reached an agreement.

Regardless of the above, there are over 1,000 documents in the form of company bank statements spanning three years, corporate formation documents, investor rights agreements, capitalization tables, email communications, loan agreements and more that require intense review and compilation and are extremely relevant to this hearing. At this time, Michael Neubig has not had an appropriate amount of time to review all documents and prepare for the upcoming hearing in a manner that would be fair and just to his defense. This is not an attempt to delay the process.

For the foregoing reasons, Defendant Michael Neubig respectfully requests that the court order that the hearing now scheduled for Tuesday, June 19th 2018, be rescheduled to a later date.

Respectfully submitted on 6/07/2018,

Michael Neubig

Mike Neubig

34 Keswick Dr., New Albany, Oh 43054

Certificate of Service

Mailed to Victoria Powers, Ice Miller LLP on 6/7/2018
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